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CHINA FREE PRESS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ZHANG ZIYI, an individual,
Plaintiff,

vs.

CHINA FREE PRESS, a North
Carolina non-profit corporation
doing business as BOXUN NEWS;
WEICAN NULL MENG, an
individual known as WATSON
MENG and also WEICAN
"WATSON" MENG; and DOES 1-
25, inclusive,
Defendants.

Case No. CV 12-5216-DMG (PLA)

**DECLARATION OF
JAMES ROSENFELD**

Hearing Date: October 12, 2012
Courtroom: 7
Time: 9:30 a.m.

Action Filed: June 14, 2012

DECLARATION OF JAMES ROSENFELD

I, James Rosenfeld, declare as follows:

1. I am a member of the bar of the State of New York and have been admitted to appear in this action *pro hac vice*. I am a member of the firm of Davis Wright Tremaine LLP, and one of the attorneys representing China Free Press (“CFP”) in this matter. The facts stated below are true of my own personal knowledge, and if called to testify, I could and would competently testify thereto.

2. On August 14, 2012, I met and conferred with counsel for Plaintiff telephonically, pursuant to Local Rule 7-3, regarding CFP’s proposed special motion to strike under C.C.P. 425.16. The parties could not reach agreement and Plaintiff’s counsel indicated that Plaintiff would oppose this Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 7th day of September, 2012 at New York, New York.

By: /s/James Rosenfeld
James Rosenfeld